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November 16, 2022

Hon. J. Paul Oetken
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Noel Sanabria, 21-cr-313 (JPO)

Dear Judge Oetken:

I am CJA counsel to Noel Sanabria. I write to respectfully request a one-time modification to Mr. Sanabria's bail conditions to permit him to spend Thanksgiving Day at his mother's home in the Bronx. Pre-Trial Services Officer Viosanny Harrison has indicated that it has no objection to this request and AUSA Rebecca Dell defers to Pre-Trial Services.

Mr. Sanabria is currently on pre-trial release on the following terms and conditions (among others not relevant to the instant application):

\$200,000 personal recognizance bond signed by two FRPs;
secured by \$100,000 cash/property; travel restricted to the
SDNY and EDNY; surrender of travel documents and no
new applications; pretrial supervision as directed by pretrial
services; and home detention with location monitoring.

ECF #15.

Mr. Sanabria has been fully compliant with the terms of his release. He asks the Court that he be permitted to spend Thursday November 24, 2022 with his family at his mother's home in the Bronx. Specifically, he wishes to be permitted to be outside his home from 12 pm – 10 pm.

As noted, Pre-Trial Services has no objection to this request and the government defers to Pre-Trial Services.

Thank you for your consideration in this matter. I am, of course, available to provide more information at the Court's convenience.

Respectfully submitted,

/s/

David S. Greenfield

cc: All Parties (via ECF)
Pre-Trial Services Officer Viosanny Harrison (via email)

Granted.
So ordered.
11/16/2022



J. PAUL OETKEN
United States District Judge